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September 3, 2021

* ADMITTED TO A BAR
OTHER THAN VA
◊ REGISTERED PATENT AGENT
◊ OF COUNSEL
△ SENIOR COUNSEL

VIA ECF

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, New York 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 9/7/2021

Re: Re: Spectrum Dynamics Medical Limited v. GE; Case No.: 18-cv-11386 (VSB)

Dear Judge Broderick:

We represent Plaintiff Spectrum Dynamics Medical Limited (“Plaintiff” or “Spectrum”) in the above-referenced action. On behalf of Plaintiff, we write pursuant to Rule 5.B. of your Honor’s Individual Practices in Civil Cases to respectfully request permission to file under seal Plaintiff’s Memorandum of Law in Support of Plaintiff’s Motion for Preliminary Injunction and accompanying Exhibits 1-5, 10, 12-23, 26, 28-31, 33-36, 38-46, 48-98, 100-110, 112, 114-136, 141-144, 147, 149-150, 152-200, 202-203, and 205-222, filed today, September 3, 2021, that contain Highly Confidential and Confidential information of the respective parties that is subject to the Stipulated Confidentiality and Protective Order [D.I. 165] (“Protective Order”). Additionally, Plaintiff requests permission to separately file exhibits that are or include native files (*i.e.*, Exhibits 13, 18, 19, 22-23, 30, 33-36, 38-39, 56, 59, 67, 70, 76, 93, 103, 110, 117, 122, 132-133, 147, 156, 158-159, 162-164, 174-183, 189, and 192) via e-mail. These exhibits also contain both Plaintiff’s and Defendants’ confidential information.

Defendants have proposed reactions of their confidential information, and Plaintiff has also done so. Thereafter, the parties met and conferred regarding the proposed redactions, and there are no unresolved objections. Accordingly, Plaintiff hereby requests leave to file the Memorandum of Law in Support of Plaintiff’s Motion for Preliminary Injunction and Exhibits 1-5, 10, 12-23, 26, 28-31, 33-36, 38-46, 48-98, 100-110, 112, 114-136, 141-144, 147, 149-150, 152-200, 202-203, and 205-222 under seal, and separately file native versions of Exhibits 13, 18,

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19, 22-23, 30, 33-36, 38-39, 56, 59, 67, 70, 76, 93, 103, 110, 117, 122, 132-133, 147, 156, 158-159, 162-164, 174-183, 189, and 192 under seal via e-mail.

The parties' proposed redactions are highlighted in yellow in the enclosed copy of Plaintiff's Motion for Preliminary Injunction, and Declarations of Scott D. Metzler, Ph.D., Eric Phillips, Yoel Zilberstien, Gilad Yoeli, Nathaniel Roth, and P. Branko Pejic.

For the aforementioned reasons, Plaintiff respectfully requests permission from this Court to file Plaintiff's Memorandum of Law in Support of Plaintiff's Motion for Preliminary Injunction, supporting Declarations, and accompanying Exhibits 1-5, 10, 12-23, 26, 28-31, 33-36, 38-46, 48-98, 100-110, 112, 114-136, 141-144, 147, 149-150, 152-200, 202-203, and 205-222 under seal.

Respectfully submitted,

/Neil F. Greenblum/

Neil F. Greenblum

cc: All counsel of record (via ECF)

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